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May 5, 2025

**VIA ECF**

Chief Judge Renée Marie Bumb, U.S.D.J.  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

**Re: *In re Toronto-Dominion Bank / First Horizon Corp. Sec. Litig.,*  
Civil Action No. 1:23-cv-02763-RMB-AMD (D.N.J)**

Dear Chief Judge Bumb,

We, along with co-counsel, represent Lead Plaintiffs in the above-referenced matter. We write to request an order concerning the page limits for Lead Plaintiffs' omnibus opposition brief in response to Defendants' four motions to dismiss (ECF Nos. 86, 87, 90, 91). Specifically, to efficiently respond to Defendants' four briefs, which total 86 pages, and present the arguments in a streamlined fashion for the Court, Lead Plaintiffs respectfully seek relief from L. Civ. R. 7.2(d) to file one omnibus brief that is no more than 70 pages. All Defendants consent to this request.

On March 14, 2025, the Court approved the parties' stipulation setting a schedule for the briefing of Defendants' pending motions to dismiss, which provided a deadline of May 9, 2025 for Lead Plaintiffs to file "an omnibus opposition brief to all Defendants' motions." ECF No. 84. On March 21, 2025, Defendants TD Bank, Bharat Masrani, Leo Salom, and Kelvin Vi Luan Truan (together, the "TD Defendants") and First Horizon, D. Bryan Jordan, and Hope Dmuchowski (together, the "First Horizon Defendants") filed two supplemental briefs in support of their motions to dismiss. ECF Nos. 86, 87. On April 11, 2025, Defendants Mia Levine and Michael Bowman each filed a motion to dismiss the third amended complaint. ECF Nos. 90, 91. Together, Defendants filed over 86 pages of motion to dismiss briefing. In light of the overlapping issues, Lead Plaintiffs request to file a single omnibus response of 70 pages (in size 14-point font). Each of the Defendants have stated they have no objection to this request.

We thank Your Honor for your consideration of this request.

Respectfully submitted,

May 5, 2025

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BRODY & AGNELLO, P.C.

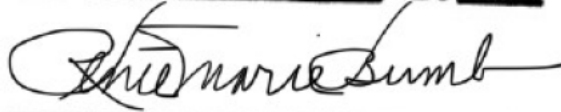
/s/James E. Cecchi

James E. Cecchi

Cc: All Counsel of Record (via ECF)

SO ORDERED this 6th day

of May 2025

A handwritten signature in black ink, appearing to read "Stephanie Sumb", written over a horizontal line.

United States District Judge